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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

PORFIRIO LEON GUZMAN,	)	Case No. 1:21-cv-01039-JLT-BAM
Plaintiff,	)	STIPULATION AND <del>PROPOSED</del>
vs.	)	ORDER FOR EXTENSION OF
	)	TIME
KILOLO KIJAKAZI, Acting	)	
Commissioner of Social Security,	)	
Defendant.	)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from April 1, 2022 to May 31, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Plaintiff's Counsel respectfully states that the requested extension is necessary as she

continues to care for her ill father in Houston, Texas with limited access to the computer. For the week of March 28, 2022, Plaintiff's Counsel has three Merit briefs due. Plaintiff's Counsel has included a declaration in support of the motion. Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: March 18, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Dolly M. Trompeter  
DOLLY M. TROMPETER  
Attorneys for Plaintiff

Dated: March 18, 2022

PHILLIP A. TALBERT  
United States Attorney  
PETER K. THOMPSON  
Acting Regional Chief Counsel, Region IX  
Social Security Administration

By: \*/s/Patrick Snyder  
Patrick Snyder  
Special Assistant United States Attorney  
Attorneys for Defendant  
(\*As authorized by email on March 18, 2022)

**ORDER**

Pursuant to the parties' stipulation, and good cause appearing, Plaintiff's second request for an extension of time to file a Motion for Summary Judgment is GRANTED. Plaintiff shall file a Motion for Summary Judgment on or before May 31, 2022. All other dates in the Court's Scheduling Order are modified accordingly.  
IT IS SO ORDERED.

Dated: March 23, 2022

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE